

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

ECC CENTCOM CONSTRUCTORS, LLC,

Plaintiff,

v.

THE UNITED STATES,

Defendant.

No. 21-1169c
(Judge Tapp)
UNOPPOSED MOTION FOR AN ENLARGEMENT OF TIME

Pursuant to Rule 6(b) of the Rules of the United States Court of Federal Claims (RCFC), defendant, the United States, respectfully requests an 11-day enlargement of time to file our reply in support of our motion to amend (ECF No. 45). Plaintiff filed its response to our motion to amend on February 17, 2023 (ECF No. 48). Pursuant to Rule 7.2(a), our reply is currently due on February 24, 2023. The 11-day extension would result in our reply deadline being moved to March 6, 2023. No other deadlines are affected by this request. We have not previously requested an extension of time for this purpose. Counsel for plaintiff does not oppose this request.

We respectfully submit that good cause supports this request. Depositions in this case are scheduled to take place from February 20 through 24. Additionally, in *Aitken et al v. United States*, No. 19-520 (Fed. Cl.), undersigned counsel is (1) attending a status conference on the February 21, (2) taking two depositions on February 22, (3) filing responses to *motions in limine* on February 24, (4) conducting an out-of-state site visit with the Court on February 28, (5) taking two depositions on March 2, (6) taking an additional deposition and attending a pretrial conference on March 3, and (7) preparing witnesses throughout that week for a trial scheduled to commence on March 13. Accordingly, undersigned needs an additional 11 days to prepare a draft and secure supervisory approval for a reply in support of defendant's motion to amend

while attending to his other responsibilities before this Court.

For these reasons, we respectfully request that the Court grant our motion for an enlargement of time of 11 days, up to and including March 6, 2023, to file defendant's reply in support of its motion to amend.

Respectfully submitted,

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Dated: February 21, 2023

Attorneys for Defendant